

## ***47 C.F.R. § 64.604 - Mandatory minimum standards.***

*The standards in this section are applicable December 18, 2000, except as stated in paragraphs (c)(2) and (c)(7) of this section.*

### *(a) Operational standards—*

#### *(1) Communications assistant (CA).*

- (i) TRS providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.*
- (ii) CAs must have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with hearing and speech disability cultures, languages and etiquette. CAs must possess clear and articulate voice communications.*
- (iii) CAs must provide a typing speed of a minimum of 60 words per minute. Technological aids may be used to reach the required typing speed. Providers must give oral-to-type tests of CA speed.*

Maryland Relay CAs (Operators) are trained to relay calls in a manner that meets and often exceeds Federal Communications Commission (FCC) standards. The following describes how Maryland Relay hires and trains its Operators to meet operational proficiency standards stated above.

Before hiring, exams are given to each applicant in the following areas to ensure that the candidate has the needed skills to become a fully trained Operator:

- (1) Spelling skills (must achieve at least 90% correct)
- (2) Reading skills (must be able to read clearly and distinctly)
- (3) Typing proficiency

### **Spelling Skills**

The minimum spelling skills required of Maryland Relay Operators is the ability to quickly and easily spell words. Operators must pass a spelling exam to be eligible to work for Maryland Relay. The spelling skills exam is based on a 12th grade spelling level.

## **English Reading, Speaking, and Writing Skills**

Maryland Relay Operators must meet all grammar proficiency requirements including reading, speaking, and writing English at a minimum of a 12th grade level prior to employment. Maryland Relay also tests for diction, clear and articulate voice communications, and a neutral accent by requiring each prospective Operator to complete the reading exam, which follows:

### **Reading Exam**

There is a new wind blowing through the quality profession. It is bringing some very different messages to those of us who manage and support the quality functions of our organizations. These messages tell us about quality in ways that are hard to reconcile with our traditional understanding of quality. They are messages like "quality is customer satisfaction" or even "quality is customer delight"; "quality people do quality work" and "quality is the expression of human excellence."

We have difficulty with the messages because, as one quality professional noted, "I don't know how to develop specifications from these ways of thinking about quality. "It is a real dilemma because our history and technology have been built upon our ability to specify, measure, and control. As long as these specifications have been based on objectively measurable phenomena like length, weight, hardness, frequency, etc., we can set standards and develop control procedures based on these standards. Now we are confronted with a way of understanding that is expressed as customer satisfaction or even customer delight. How are we to translate this into specifications and standards?"

### **Typing Proficiency**

Maryland Relay Operators must type 60 words per minute (wpm). Maryland Relay exceeds this service level by requiring Operators to maintain a 95% accuracy level while typing 60-wpm. The Maryland Center has an average typing speed of 62.4 wpm with 96% accuracy. New Operator hires are required to meet the Maryland Relay minimum typing proficiency standard on an oral-to-text exam within a three week period, before they may take calls. Maryland Relay also tests its Operators every four months in a manner simulating actual working conditions to document current proficiency levels of the Operators.

Maryland Relay also uses a computer based typing program for continuing enhancement of keyboarding, spelling and grammar skills. This program is available in the Maryland Relay center for Operators to use.

### **Initial Training**

During the training process, Operators are instructed on the proper phrasing of typed American Sign Language (ASL) "gloss" (written form of ASL) and grammar, tone of voice, hearing and speech disabled cultures, TTY etiquette, pertinent information about the needs of deaf, hard-of-hearing and speech impaired users, the role of the Operator, and operation of relay telecommunications equipment including answering machines and computerized services. This is done through

videos, training seminars, observation, both simulated and monitored live calls, and a variety of role play scenarios. Maryland Relay Operators are well trained to effectively meet the specialized needs of hearing and speech-disabled individuals as explained below.

Maryland Relay has a Training Coordinator who is responsible for the overall training program. This person performs all classroom training and leads role-play activities. In addition, Maryland Relay's outreach employees and Operators all help carry out training by teaching relay user culture. Furthermore, during training, Operators share general knowledge about the relay and assist with role playing activities.

During the first three weeks of employment, Operators are introduced to basic ASL training including in-depth information on the deaf syntax, culture, and basic limited signing.

Throughout their employment, Maryland Relay Operators attend continuing educational classes and seminars for refreshing and expanding information learned in the initial training classes.

In order to become a Speech-to-Speech (STS) Operator, an individual must pass the same tests as traditional Operators, meet more stringent STS criteria and pass an STS exam. Once an Operator has been accepted into the STS Program, he/she receives specialized STS training.

During the training, STS Operators learn about speech disabilities and are given specific strategies to use in order to facilitate calls between STS users and end users. STS Operators also receive detailed training on STS policies and procedures. As follow-up to the initial training, the STS Program Supervisor continually educates all STS Operators on speech disabilities, their respective implications and etiquette, through the use of a STS newsletter, STS Resource Library materials (articles, books, videos, etc.), workshops, and in-service meetings.

Maryland Relay Spanish Operators must complete the same training plus pass additional tests showing proficiency in the Spanish language.

### **Disability/Relay/Deaf Culture Training**

All relay service staff, including management, receive training devoted solely to disability issues, including ASL "gloss" and grammar, Deaf culture, issues relating to hard of hearing, late-deafened and speech-disabled users, dual sensory impaired users, diversity issues, ethics and confidentiality.

Maryland Relay requires some Operators to be trained and certified to interpret verbatim, calls involving ASL and English. Only a person fluent in both languages

(English and ASL) and interpretation has the skill level to voice ASL gloss into spoken English or to type spoken English back to an ASL user, a requirement of the Maryland Relay.

Maryland Relay's training gives all Operators the knowledge to recognize the appropriate time and situation to call on an ASL translator/interpreter to handle an ASL call, by showing them how to identify ASL gloss. Maryland Relay does not allow a non-certified Operator to translate/interpret ASL Maryland Relay calls. A person fluent in ASL translation is on duty at the relay center at all times to assist Operators with ASL translation.

In addition, Maryland Relay provides 20 hours of specialized/cultural training to each relay service staff annually.

## **Proficiency Examinations**

Maryland Relay Operators begin relaying calls at the end of the three-week training period, if all proficiency skills are met, including the fundamentals of ASL. In addition to the aforementioned exams, Operators must successfully complete several relay call scenarios to demonstrate proficiency in simulated scenarios. Maryland Relay can then determine that an Operator is meeting and exceeding all minimum FCC proficiency requirements. Tests are kept confidential and portions of the tests are changed routinely. Any Operator who cannot pass this examination within a three-month probationary period will not be retained as a relay Operator. Operators are tested on a variety of topics monthly to ensure that they continue to meet all requirements. Maryland Relay retains all testing documentation.

The performance-based testing used by Maryland Relay consists of several relay test calls. A variety of call scenarios is given to the Operator to complete. Supervisors “grade” the Operator on his/her ability to set-up the call, make appropriate billing arrangements, relay the call, typing and spelling accuracy, and overall proficiency of translating written ASL (when requested) and tone of voice. Various types of relay calls are tested.

During relay call testing Operators must demonstrate a clear understanding of deaf culture, ethics and confidentiality and professional judgment. These calls also test the Operators knowledge of relay procedures, conveyance of non-TTY and TTY user’s tone of voice or expressive words.

## **Performance Monitoring to Ensure Each Operator Continues to Meet All Requirements**

Maryland Relay constantly monitors its Operators for quality ensuring formal call evaluations are completed each month, as well as informal “spot checking” every day to ensure that Operators are performing properly on calls.

Through its relay provider’s advanced relay platform, Maryland Relay has established a unique “remote” call monitoring system. Monitoring staff are able to remotely monitor at any time. Informal feedback is provided immediately to Operators. Maryland Relay also uses this call monitoring system to perform monthly evaluation summaries of proficiency and professionalism, procedures, language, voice quality, decorum, and professional knowledge and skills.

Scores from the call monitoring are calculated and given to the Operator so that progress and improvement can be tracked each month. In addition, a “center” report is generated that allows Maryland Relay to monitor overall quality improvements. This system allows Maryland Relay to set quality improvement goals for individuals as well as for the entire center.

Through the call monitoring process, any Operator not in compliance with quality standards is taken off duty for further training and re-testing. These Operators are put on probation and monitored frequently to ensure continued improvement.

Quality measurements give Maryland Relay an accurate picture of each Operator's skills as well as a record from which improvement plans can be built and future progress measured.

*(v) Operators answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of ten minutes. CAs answering and placing an STS call must stay with the call for a minimum of fifteen minutes.*

*(vi) TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.*

Maryland Relay does not change Operators during a call. Even at the end of shifts, over lunch hours, and other breaks, Maryland Relay Operators stay with a call until it is completed. Our experience has been that this provides much greater continuity for the user.

Maryland Relay exceeds the FCC standard for substitution of Operators for TTY-based TRS, VRS calls and STS TRS. Maryland Relay pays a premium rate to maintain this level of service.

Maryland Relay only substitutes an Operator if the following should occur:

- **A caller requests a change in gender of the Operator**  
Maryland Relay Operators, when requested, will switch a call to another Operator who is of the same gender as the caller and retain that Operator for the user throughout the relay call.
- **Verbal abuse or obscenity is directed to the Operator**  
If a relay user becomes abusive towards an Operator (calling names, etc.) or does not give a number to dial, Maryland Relay's procedure is to send a hot key requesting the number to call three times, waiting approximately 20 to 30 seconds between each time the hot key is sent. If the Operator is still being harassed or is not given a number to dial, a supervisor is called. The supervisor will try to process the call. If abuse continues or there is no response, a disconnect slip will be completed.
- **The call requires a specialist (Spanish language, speech to speech, etc.)**
- **A perceived conflict of interest exists or,**
- **A major emergency exists**

A change never takes place until either the calling or called party has completed their part of the conversation.

If a call does need to be transferred, another Operator replaces the Operator relaying the call at the same workstation so that the relay user's call is not interrupted (except to identify the new Operator to both parties). A supervisor monitors the change and must approve the change based on the criteria listed above.

*(vii) TRS shall transmit conversations between TTY and voice callers in real time.*

Maryland Relay transmits conversations between TTY and voice callers in real time. Maryland Relay provides real time text to voice and voice to text calls in which a deaf, hard of hearing or speech disabled person utilizing a TTY or another form of text telephone can communicate over the existing telecommunications network with a non-TTY user (and vice-versa) through the voice assistance of the relay service (Operator).

*(2) Confidentiality and conversation content.*

*(i) Except as authorized by section 705 of the Communications Act, 47 U.S.C. 605, CAs are prohibited from disclosing the content of any relayed conversation regardless of content, and with a limited exception for STS CAs, from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law. STS CAs may retain information from a particular call in order to facilitate the completion of consecutive calls, at the request of the user. The caller may request the STS CA to retain such information, or the CA may ask the caller if he wants the CA to repeat the same information during subsequent calls. The CA may retain the information only for as long as it takes to complete the subsequent calls.*

*(ii) CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim unless the relay user specifically requests summarization, or if the user requests interpretation of an ASL call. An STS CA may facilitate the call of an STS user with a speech disability so long as the CA does not interfere with the independence of the user, the user maintains control of the conversation, and the user does not object. Appropriate measures must be taken by relay providers to ensure that confidentiality of VRS users is maintained.*

The Maryland Relay Operators are prohibited from disclosing the content of any relayed conversation, regardless of the content, and from keeping records of the content of any conversation beyond the duration of a call. Operators are also prohibited from intentionally altering a relayed conversation. Maryland Relay Operators type everything verbatim unless one of the relay users involved in the conversation requests summarization or translation. In that event, the Operator gains permission from the other party involved in the call. If both parties agree to translation, the Operator will then begin translation. Relay users who always want translation, can select this option on the customer profile.

All Maryland Relay STS Operators have the authority, at the request of the STS user, to retain information beyond the duration of a call in order to facilitate the



completion of consecutive calls. STS Operators repeat any information (without the STS user having to say the same thing each time) during subsequent calls if requested to do so. STS Operators only retain this information for as long as it takes to complete the subsequent calls.

All Maryland Relay STS Operators are permitted to facilitate a call for a user with a speech disability if the user does not oppose the intervention. STS Operators do not interfere with the independence of the user; the user maintains complete control of the conversation.

## **Policies of Confidentiality**

Maryland Relay's provider understands the importance and is experienced at relaying conversations promptly and accurately while maintaining the privacy of persons who use telecommunications relay services. All calls handled by the Maryland Relay are confidential; no written or electronic script or record of any type is kept beyond the duration of the call. Maryland Relay Operators and supervisory personnel understand that they shall not reveal information about any call, at anytime, regardless of content except the minimum necessary for billing purposes. All relay personnel are required to sign a Pledge of Confidentiality promising not to disclose the identity of any callers or fellow Operators or any information learned during the course of relaying calls during their period of employment as an Operator or after termination of employment. When relaying calls or analyzing data, Maryland Relay uses the following confidentiality practices:

1. All Operators are given thorough training on the significance and importance of maintaining confidentiality from both a legal perspective and a moral perspective.
2. All Operators, prior to taking any live calls or being allowed in the relay center, are given a copy of Maryland Relay's policies of confidentiality in addition to a copy of their signed Pledge of Confidentiality.
3. Maryland Relay's policy requires immediate termination for any violation of confidentiality.

Maryland Relay has additional protocols in place to prevent an unintentional disclosure of relayed conversations. The Operators' Procedure Handbook includes rules and regulations which must be followed to prevent any unintentional disclosure of confidential information.

The facility, in which the Operators perform their specialized duties, is located in a private room at the offices of Hamilton at 1 Science Park, Frostburg Business Park, Frostburg, Maryland 21532. The room is clearly marked prohibiting any unauthorized access.

### **Confidentiality During Training**

When training new Operators, trainers do not reveal any of the following information:

- (1) Names, genders, or ages of the parties involved in the call
- (2) Originating or terminating points of the call
- (3) Specifics of the information conveyed

### **Discussion of Calls**

Maryland Relay Operators understand that they shall not discuss, even among themselves or their supervisors, any names or specifics of any relay call except in instances of resolving complaints. Maryland Relay Operators also understand that they may discuss the general situation surrounding a call with their supervisor in order to clarify how to handle a particular type of relay call and for that limited purpose only. Operators are trained to ask questions about procedures without revealing names or specific information that will identify callers. They are also trained to recognize emergency or life threatening situations and understand those circumstances in which the Operator may disclose names and specific information in order to expeditiously address the situation.

### **Watching or Listening to Actual Calls**

No one is allowed to watch or listen to actual calls other than the Operator.

### **Violation of Confidentiality**

Any of Maryland Relay's Operators or supervisors who, after an investigation, have been found to violate the confidentiality rules and regulations will be terminated immediately. If a consumer alleges a violation of confidentiality and the same was reported to the relay center or to the Maryland Department of Budget and Management in any manner, Maryland Relay's policy is to first investigate the alleged violation internally and make a written report both for the complaint file of the relay service as well as for the personnel file of the individual or individuals alleged to be involved. If a violation is found to have occurred, the party(s) responsible for the violation is terminated immediately.

## PLEDGE OF CONFIDENTIALITY

I, the undersigned Relay Service Operator for the Relay Center, do hereby recognize the serious and confidential nature of this position and therefore promise in all good faith and conscience to abide by the following guidelines:

- 1) Under no circumstances will I disclose to an individual the identity of any caller or information I may learn about a caller while relaying his/her messages.
- 2) Under no circumstances will I act upon any information I may learn while relaying a call.
- 3) Under no circumstances will I disclose to anyone the names, schedules or personal information of any fellow Relay Service Operator or supervisor working at the Relay Center.
- 4) I will not share any information about a caller with any person with the exception of relay center supervisory personnel and then only to the extent necessary to resolve complaints, collect or clarify personal information necessary to provide and bill for relay services, such general information as may be necessary for the supervisor to assist in clarifying how to process a particular type of relay call, and such specific information as may be necessary for a supervisor to assist in expeditiously addressing an emergency situation.
- 5) In the event of my resignation or termination of my employment, I will continue to hold in strictest confidence all information related to the work I have performed as a Relay Service Operator.

Name (sign) \_\_\_\_\_

Name (print) \_\_\_\_\_

Date \_\_\_\_\_

### *(3) Types of calls.*

*(i) Consistent with the obligations of telecommunications carrier operators, CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.*

*(ii) Relay services shall be capable of handling any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so. Relay service providers have the burden of proving the infeasibility of handling any type of call.*

*(iii) Relay service providers are permitted to decline to complete a call because credit authorization is denied.*

Maryland Relay does not and will not place any restrictions on the length or number of single or sequential calls placed by customers through the relay center. Maryland Relay will continue to manage its traffic loads in a manner that will not require that customers be asked to call back later.

Maryland Relay is capable of processing non-coin-sent paid calls, sent-paid calls, collect calls, person-to-person calls, international calls, hotel calls and calls charged to a third party. Maryland Relay is also able to process credit cards, any Maryland local exchange calling cards and all non-proprietary interexchange company calling cards that are accessed by dialing an 800 number. This includes all major interexchange company calling cards. Relay users simply inform Maryland Relay Operators when they want to use an alternate form of billing. The Operator selects the correct billing method from an on-screen menu and the call is then placed. The customer's carrier of choice bills the call (based on conversation time) for intralata, interlata, and international calls.

### **Coin Sent Paid**

Maryland Relay is capable of handling any call normally provided by common carriers with the exception of coin sent paid calls. Maryland Relay has chosen not to invest in the technology to process coin sent paid calls. The technology and networks between the common carrier network, payphones, and relay do not allow for signaling to be passed so that an Operator can determine when coins have been dropped into the payphone. Furthermore, the FCC ordered that coin sent paid calls are not feasible.

Maryland Relay does not charge relay users who want to place a local call from a payphone as stated in the current FCC coin sent paid order.

Relay users making a long distance call from a payphone are able to use a calling card (debit card, regular calling card, etc.) or place a collect or third party call. The

customer's carrier of choice then rates and bills any long distance payphone calls. Once billing has been established the call is processed as a regular relay call. In this manner, all relay users have access to anyone from a payphone.

## **Cellular/Wireless/PCS Phone Access**

Maryland Relay is capable of processing relay calls that involve pagers, cellular and personal communications services. These services are all part of the Public Switched Network and they are handled just like any other relay call.

Maryland Relay has Dual Tone Multi-Frequency (DTMF) boxes at each workstation to perform dialing or access functions for relay users. DTMF boxes send tones that activate automated voice systems and pagers. With DTMF capability, Maryland Relay can navigate voice menus, answering machines, or any other automated system that either record or passes on voice, text, or electronic message to the other party even when using a wireless device.

One exception is when false Automatic Number Identification (ANI) information is forwarded. Although infrequent, this situation would require the Operator to ask for an alternate form of billing.

The relay switch identifies wireless calls with a false ANI associated with it and Maryland Relay processes the call as “no bill” preventing the relay user from having to use alternate form of billing.

## **Directory Assistance**

Maryland Relay gives all relay users access to local, intrastate and interstate directory assistance services via the relay and processes directory assistance requests in the same manner as any other relay requests.

Upon receiving the area code from the relay user, the Operator dials the correct area code plus 555-1212. When reaching the directory assistance operator, the Operator identifies the relay and asks for the city and state the user has given while at the same time keeping the relay user informed. When the correct number has been obtained the call is handled as a regular relay call.

- **End User Billing for Directory Assistance**

The relay user can pick which carrier they want to use for directory assistance. The relay user's carrier of choice bills for interlata and intralata directory assistance calls at their tariffed rate. With intralata presubscription, all billing is performed by the customer's carrier. All directory assistance calls are sent to the customer's carrier of choice for processing and billing. Maryland Relay does not set any rates for long distance or operator assisted calls since the customer's carrier of choice bills these calls. All directory assistance calls are billed via the customers' long distance carrier.

## **Network Access**

Maryland Relay's system provides for and serves all of the following types of calls.

- (1) Local calls originating and terminating within Maryland, including Extended Area Service (EAS) and optional calling plan calls
- (2) Intralata, interstate calls which are considered local calls – Billed to the TRS Interstate Fund (National Exchange Carrier Association or NECA)
- (3) Intralata calls originating and terminating within Maryland
- (4) Intrastate, interlata calls originating and terminating in Maryland
- (5) Interstate calls that originate within Maryland and terminate outside of Maryland - Billed to the TRS Interstate Fund (NECA)
- (6) Interstate calls that originate outside of Maryland and terminate in Maryland - Billed to the TRS Interstate Fund (NECA)
- (7) Interstate calls that originate outside of Maryland and terminate outside of Maryland - Billed to the TRS Interstate Fund (NECA)

Maryland Relay 800 numbers, including 711, are able to place call types 1-7 listed above. Maryland Relay's service is designed so that all calls made through its relay centers are billed from the originating telephone number to the terminating telephone number as if the call were made directly with no relay intervention. The relay platform includes necessary information about EAS and optional calling plan arrangements in Maryland so that calls made within an EAS area or optional calling area are not billed to the customer. ANI information appears at the workstation automatically and the terminating number is keyed in by the Operator so that a billing record can be created. For calls originating in areas where ANI information is not forwarded, Maryland Relay Operators will key in originating number information.

Maryland Relay does not charge users of Maryland Relay for use of the relay service. Users access the relay service via toll-free 800 numbers, which are accessible anywhere in the United States or by dialing 711. Calling and called parties bear no charges for calls originating and terminating within the same toll-free local calling area, including all EAS locations and/or local optional calling plan data.

## **Local and Intrastate Relay Calling**

Maryland Relay provides local and intrastate calling to the users of Maryland Relay and has obtained the necessary Numbering Plan Area/Exchange code (NPA/NXX)

information to build a database to identify the difference between local and intrastate calls (including expanded local information).

Maryland Relay has contacted the Local Exchange Carriers (LECs) within Maryland to collect all EAS and local optional calling plan information. Maryland Relay has updated its database within its switching platform and its toll processing system to identify certain NPA-NXXs as toll-free calling areas. Relay users with access to optional calling plans are not billed any more for calls to the specific optional calling area than if they would have called directly through their local network.

The calling party's ANI is compared to the called number. The relay database used by Maryland Relay determines if it is a local or intrastate toll call and gives the Operator notification if billing information is required. If it is a local call, no billing arrangements are necessary and there are no charges. If it is a toll call, Maryland Relay sends the call to the customer's carrier of choice for billing purposes.

The entire call process and Operator procedures used by Maryland Relay are designed to make the relay center transparent. To the relay user, a call looks like it was placed from his or her primary location to the call destination. Relay users do not see or get billed for the "links" going to and from the relay center. Relay users receive no billing for local calls. Intrastate/intralata calls are billed by the customer's carrier.

### **Access to Regionally Directed Toll-Free Numbers**

Maryland Relay allows access to regionally directed toll-free numbers. Because Maryland Relay passes true Caller ID information, the caller's ANI reflects a Maryland number, which results in the call being routed to the correct state or regional location.

### **Access to Restricted Toll Free Numbers**

The service provided by Maryland Relay allows access to restricted 800 numbers and other special prefixes. Maryland Relay is providing this service today through an incumbent LEC via re-originating dial tone. Maryland Relay makes sure that all of the relay users in Maryland have access to all 800 numbers and other special prefixes.

### **Access to Businesses with Special Prefixes**

Maryland Relay understands that some local telephone companies have abbreviated numbers available for services calls. Maryland Relay will continue to work with LEC to ensure proper routing and will allow Maryland relay users to access businesses with special prefixes.

### **Relaying Interstate and International Long Distance Calls**



Maryland Relay provides interstate and international calling to Maryland relay users. As stated in the previous section, Maryland Relay does not bill any long distance calls and thus is not in control of other carrier's discounts for relay calls. Maryland Relay does provide to relay users a list of carriers available through the relay with customer service numbers so that a relay user can call any long distance company of their choosing to gather rate information, sign up for a relay discount, etc.

Following in this section is a complete description of how users are billed for long distance relay calls.

### **Inbound International Calls**

Maryland Relay provides inbound International calling in which the relay user pays to place a call from an International location to the relay center. Maryland Relay then places the outbound call to a destination in the United States free of charge and relays the conversation for them. All processed International calls are billed to the Interstate TRS Fund Administrator.

### **End User Billing for all Toll Calls**

Interlata (including interstate and international) and intralata long distance toll charges are recorded and billed by the relay users' carrier of choice in the same manner as the carrier bills that customer for direct interstate and intrastate long distance calls. On each interlata and intralata call, Maryland Relay forwards the appropriate information digits, calling number and called number as part of the call information so that the long distance company can bill the customer directly or through their normal billing mechanisms.

Maryland Relay forwards information on each toll call to the relay user's carrier at the time the relay call actually takes place. The record contains: the originating and terminating numbers and the call type (e.g., person-to person, collect). Interlata and intralata billing records are created by the interexchange carrier as a result of the information digits and calling and called number data being sent to the interexchange carrier at the time the call is made. Long distance charges are based on the originating and terminating numbers. The location of the relay center does not affect billing. The long distance carrier bills based on conversation time using their own rounding calculations. Maryland Relay does not pass session time on to the carrier so only conversation time is billed by the carrier. Billing and collection is then the responsibility of the interexchange carrier who carries the call.

The format of the bill for all toll calls is determined by the carrier as Maryland Relay does not bill any relay calls. However, the call digit information will identify the call as a Maryland TRS call and will further designate the type of call (i.e. 3rd number call, direct dial call, collect call, and person-to-person call). This allows carriers to correctly identify each relay call on their bill.

All billing to the relay user is based on minutes of conversation and is processed by the relay user's carrier of choice.

Maryland Relay has the ability to place the following call types:

Bill to ANI	Person to Person
Third Party	PP - Bill to ANI
Collect	PP – Third Party
Calling Card/Credit Card	PP – Collect
Prepaid Calling Cards	PP – Calling Card/Credit Card

### **Automated Billing System to Determine Call Jurisdiction**

Maryland Relay makes use of an automated billing system to determine call jurisdiction. Maryland Relay marks on every billing record whether the call is local, EAS, intrastate or interstate. This is done immediately when the call is placed. Maryland Relay performs a second check of call jurisdiction during the monthly settlement process. In addition to redundant jurisdiction look-ups, Maryland Relay also accounts for every minute of relay use. This means that all reports must balance at the end of every month in each jurisdiction category. This additional safeguard ensures that all minutes are accounted for correctly. Maryland Relay bills the Interstate TRS Fund Administrator for all interstate minutes.

*(iv) Relay services shall be capable of handling pay-per-call calls.*

## **Pay-Per-Call Services**

Maryland Relay allows relay users to access intrastate and interstate 800, 900 and 976 pay-per-call services in which the company providing the service bills the end-user directly. Maryland Relay has established the necessary trunking to the carriers participating in relay equal access so that the carrier can bill directly for this call.

Maryland Relay's provider bills the Interstate TRS Fund and the Maryland Department of Budget and Management using the percentage split defined by the Interstate TRS Fund Administrator for 800, 900, and 976 calls. Customers may choose to block 976 and 900 calls from being made altogether via forms provided by Maryland Relay.

*(v) TRS providers are required to provide the following types of TRS calls: (1) Text-to-voice and voice-to-text; (2) VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO; (3) HCO, two-line HCO, HCO-to-TTY, HCO-to-HCO.*

## **TTY/ASCII to Voice**

Maryland Relay is able to accept a call from a TTY equipped caller, place a call to a hearing and voice capable caller and translate the voice messages to TTY messages and TTY messages to voice messages in order to complete the communications link.

## **Voice to Text Call Processing**

Maryland Relay is able to accept a call from a hearing and voice capable caller, place a call to TTY equipped caller and translate the voice messages to TTY messages and TTY messages to voice messages in order to complete the communications link.

## **Voice Carryover (VCO)**

Maryland Relay allows VCO users to utilize both TTY modes, acoustic mode and direct connect mode. A variety of VCO call types are also available through Maryland Relay.

## **Two-Line VCO**

Maryland Relay provides **two-line VCO** capability which allows a VCO user to have a more interactive conversation. By using two telephone lines, the caller can listen to their conversation if they have some hearing available, on one line while receiving typed text from an Operator on the other line, thus creating a more natural flow of conversation.

## **Reverse Two-line VCO**

Maryland Relay's Two-line VCO feature also works in the reverse when a voice user places a call to a two-line VCO user through relay. It is then called Reverse Two-line VCO.

## **VCO-TTY and TTY-VCO**

Maryland Relay provides this service in which VCO users can call a TTY user (or vice versa) through the relay. The VCO user voices his/her conversation which the Operator types to the TTY user. The TTY user types his/her conversation directly to the VCO user.

## **VCO-VCO**

Maryland Relay provides VCO to VCO service where the Operator types to both parties, preventing the VCO users from having to type their part of the conversation.

## **Hearing Carryover (HCO)**

Maryland Relay allows HCO users to utilize both TTY modes, acoustic mode and direct connect mode. A variety of HCO call types are also available through Maryland relay.

## **Two-Line HCO**

Maryland Relay provides **two-line HCO** capability.

## **HCO-TTY and TTY-HCO**

Maryland Relay provides this feature allowing HCO users to contact TTY users (or vice versa) via the relay.

## **HCO-HCO**

This service allows two HCO users to contact each other through the relay. Maryland Relay provides HCO to HCO service where the Operator voices to both parties, preventing the HCO users from having to read the other party's conversation.

*(vi) TRS providers are required to provide the following features:*

*(1) Call release functionality; (2) speed dialing functionality; and (3) three-way calling functionality.*

## **TTY to TTY Call Release**

Maryland Relay processes TTY to TTY calls when it is necessary to go through a voice switchboard first, or if the originating TTY user is using a calling card that is accessed by calling an 800 number first. Once the Operator reaches a compatible TTY user when placing a relay call, Maryland Relay gives the calling party the option to communicate independent of the relay function.

The Operator receives an automated message box with instructions to release the call from the workstation. Once the call has been released from the workstation, the Operator is able to take any other incoming calls.

Using the above procedure, Maryland Relay provides a true call release function to satisfy the FCC requirement, which removes the workstation from the call. If the call is a long distance call, the call is billed as a normal relay call (i.e. the relay user's carrier of choice).

### **Voice to Voice Call Release**

Maryland Relay provides a voice to voice call release function, which removes the workstation from the call. If the call is a long distance call, the call is billed as a normal relay call (i.e. the relay user's carrier of choice). Once the call has been released from the workstation, the call ceases to be a TRS call and is not subject to the per-minute charge to the State.

### **Speed dialing**

Maryland Relay has developed a customer profile for relay users to indicate calling preferences. Customer profile information is presented to the Operator each time the relay user calls the relay and includes the option of Speed Dialing. In the Speed Dialing section of the Customer Profile form, customers list the first name and phone number of people they call often through the relay.

### **Three-way calling**

In compliance with the FCC Order released on June 17, 2003, Maryland Relay provides three-way calling capability, in which the customer (if the customer has purchased this feature from his/her LEC) can use this feature to either tie the third party directly into the conversation or to tie the third party in by making a second call to the relay center.

*(vii) Voice mail and interactive menus. CAs must alert the TRS user to the presence of a recorded message and interactive menu through a hot key on the CA's terminal. The hot key will send text from the CA to the consumer's TTY indicating that a recording or interactive menu has been encountered. Relay providers shall electronically capture recorded messages and retain them for the length of the call. Relay providers may not impose any charges for additional calls, which must be made by the relay user in order to complete calls involving recorded or interactive messages.*

### **Machine Recording Capabilities**

Maryland Relay has a recording function that allows the Operator to record a voice announcement and then play back the message at a speed controlled by the Operator. The Operator informs the relay user through the use of a hot key on the Operator's terminal that a recording has been reached, followed by another hot key stating (OPERATOR HERE WOULD YOU LIKE COMPLETE MSG TYPED OR HOLD FOR A DEPT OR LIVE PERSON Q).

If a caller requests a department or live person, the Operator types, “HLDING FOR DEPT/PERSON” and presses the appropriate option when the recording prompts.

If a caller requests listening to the complete message, the Operator sends a hot key that states, “COLLECTING INFO PLS HLD” and the Operator continues to collect the recording.

The message is retained only for the length of the call. This prevents the caller from having to call back several times to get the entire message. Once the originator of the call disconnects, the recording is automatically deleted from the system.

Whenever Maryland Relay has to redial to an answering machine, voice mail, interactive voice messaging unit, or any other type of recording system, for whatever reason, Maryland Relay does so without billing the customer for any subsequent long distance relay calls.

*(viii) TRS providers shall provide, as TRS features, answering machine and voice mail retrieval.*

### **Answering Machine and Voice Mail Retrieval**

Operators are trained in retrieving and relaying TTY messages to voice users and voice messages to TTY users from voice processing systems. Operators use the following procedures to obtain messages for relay users:

1. The user is informed that the Operator has reached a voice processing system.
2. If the user requests message retrieval, Maryland Relay obtains the appropriate access codes from the user. Maryland Relay does not retain access codes or any other information needed to access a voice mail system subsequent to the call. This information is considered “call” information and just like any other call information is kept confidential.
3. After the voice processing system has been accessed, Maryland Relay Operators begin to relay any messages that have been recorded or leave a message as requested. Maryland Relay makes use of its advanced recording function to capture this information as discussed previously.
4. If the Operators must call again to finish relaying any messages, Maryland Relay Operators do so without billing the end user for subsequent calls.

Maryland Relay alerts relay users to the presence of a recorded message and/or interactive menu. Maryland Relay uses hot keys (automated macros) to announce recordings or interactive messages. Maryland Relay does not charge a relay user for subsequent calls to a recording or to interactive messages.

## **Answering Machine Retrieval (Single-Line)**

Maryland Relay provides this service in which messages from a voice or TTY answering machine or a single line telephone are retrieved by the Operator. The caller requests Automatic Message Retrieval (AMR) or Single Line Answering Machine (SLAM) and plays the messages to the Operators by putting the handset near the speaker of the answering machine. The technology used by Maryland Relay records any messages, enabling the Operators to capture the information and type or voice it back to the relay customer. Once the information is relayed to the caller and the call is completed, the recording is automatically erased when the caller disconnects.

*(4) Handling of emergency calls. Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point (PSAP). An appropriate PSAP is either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.*

## **The Procedure used by Maryland Relay for Handling Emergency Calls**

Maryland Relay uses a national Emergency Call Relay Center, operated by Intrado, Inc., for the provision of handling emergency relay calls.

Maryland Relay uses Intrado and follows the procedures below:

- If the caller has the local emergency number which needs to be accessed, the call is promptly placed and handled in the same manner as any other relay call.
- In the event that the caller does not have the access number to 911 and the emergency appears to be of such a nature that time will not permit the caller to hang up and call directly to 911, the Operator will contact the Emergency Call Relay Center (ECRC) which is accomplished through one stroke on the keyboard.
- Simultaneously, the Operator obtains the address from which the person is calling from and selects the “emergency call” box option on the software at the workstation. (A Supervisor assists every 911 call. When an Operator makes this selection, a Supervisor is notified immediately as a flag indicator on the Supervisor Console is activated.)
- Once connected to the ECRC, the Operator will identify as a TTY relay call and relay the location of the caller. (If the Operator does not obtain location information, the Operator gives the ECRC the ANI of the caller.)
- The ECRC immediately transfers the call to the appropriate Public Service Answering Point (PSAP) center. The ECRC drops off the call once confirming



that both parties are on the line and the correct PSAP has been reached. The Operator processes the call as normal.

- Maryland Relay passes the caller's telephone number to the PSAP when a caller disconnects before being connected to emergency services.

#### **Back-up Emergency Procedures**

- As a back-up to Intrado in the event that Intrado is unable to match the caller with the appropriate PSAP, Maryland Relay has procedures in place to access its own emergency database.
- The software used by Maryland Relay takes the NPA/NXX information from the ANI of an incoming call and matches it to information in its database. The ANI indicates what city or location a call is coming from. This NPA/NXX information is then cross-referenced to a list of towns and locations in the State of Maryland stored in the database. Maryland Relay has mapped each NPA/NXX in Maryland to the appropriate PSAP. Once this search is complete (it only takes a second) the correct emergency telephone number is loaded automatically into the "outdial" box and the Operator can immediately dial the appropriate emergency personnel. This process ensures that Maryland Relay users have access to the correct and appropriate PSAP when their call is handled in any Hamilton facility.
- Maryland Relay passes the caller's telephone number to the PSAP when a caller disconnects before being connected to emergency services.
- If the caller is using a cellular phone, the ANI is not a good indication of where the caller is actually calling from. In this case, the Operator asks for the nearest city name and initiates an automated search for the appropriate PSAP. If several PSAPs are listed for the same city, the Operator will try to identify the correct one with a quick question to the caller.
- Maryland Relay's emergency database application described above meets the new requirements established by the FCC.

#### **FCC Rules for Emergency Calls**

In the June 2004 order, the FCC adopted the definition of "appropriate" PSAP as "either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner." The database used by Maryland Relay automatically and immediately transfers the caller to the appropriate Public Safety Answering Point based on NPA/NXX information.

The key to providing the best service in emergency situations is to maintain an updated list of Public Emergency Service Answering Point numbers (i.e. 911 centers). Maryland Relay accomplishes this through two mechanisms to ensure that relay users are connected to the appropriate PSAP: 1) through the use of Intrado's 9-1-1 infrastructure and 2) through the PSAP database maintained by Maryland Relay's provider.

### **TTY to TTY Communications Between PSAP and Caller**

Maryland Relay will process direct TTY to TTY communications between the PSAP and the TTY caller.

### **If a Caller Disconnects Before Being Connected to the PSAP**

In the event that a caller disconnects before being connected to the PSAP even if the Operator is unable to get the number of the caller before the call is disconnected, the workstation contains a notification feature that initiates a command to write a record of the ANI calling for emergency assistance. The Supervisor can then access this information if needed, so no matter when the caller hangs up, Maryland Relay can send the correct ANI information to the 911 center.

The Supervisor will contact the appropriate 911 center and give the dispatcher any pertinent information collected on the call. This includes ANI for the caller so that if the 911 center has "Enhanced 911 Services", emergency personnel will be able to locate where the person in need is calling from.

During the course of any emergency 911 calls, the Operator continually attempts to solicit as much information as possible about the nature of the emergency so that in the event that the caller cannot complete the call for any reason, the Operator may have an opportunity to seek out the appropriate emergency assistance. The Operator then gives the dispatcher any pertinent information collected on the call even if the originator of the call has disconnected. This includes ANI for the caller so that if the 911 center has "Enhanced 911 Services", emergency personnel will be able to locate where the person in need is calling from. This meets the FCC's new requirement where an Operator must pass along the caller's telephone number to the PSAP when a caller disconnects before being connected to emergency services. This allows the PSAP to follow their regular procedures, which is to call back the person calling for help.

The emergency call plan used by Maryland Relay follows this section. This covers the scenario of a relay user disconnecting before the call is completed. If the 911 call is completed, the Operator will follow normal relay procedures with the assistance of a supervisor and the caller's ANI is transferred to the appropriate PSAP as described above.

## **911 Procedures**

If the caller disconnects before the emergency call to the PSAP is completed:  
Call the 911 Dispatch number that is listed in the Emergencyfile.txt or the  
emergency dispatch numbers file ASAP (all of this is immediately available on the  
Operator's workstation screen). Remember this is a 911 call.

When you reach the 911 dispatch operator use the following steps:

- A. **Greeting:** This is "Operator XXXX" from "State" Relay Center. We just received a 911 call that wasn't completed. The caller uses a TTY and may be Hard of Hearing, Speech Disabled, or Deaf. The ANI is XXX-XXX-XXXX.
- B. Ask the 911 dispatch operator if they have a TTY. If they do not proceed to item "C". Ask if they know how to use the TTY. If they don't know how to use the TTY proceed to item "C". If they know how to use the TTY proceed to item "E".
- C. Give the 911 dispatch operator the Voice relay number for the correct state.
  1. LA 800-947-5277
  2. WI 800-947-6644
  3. KY 800-648-6057
  4. NE 800-833-0920
  5. ID 800-377-1363
  6. RI 800-745-6575
  7. ME 800-457-1220
  8. WY: 800-877-9975
  9. IA: 800-735-2943
  10. MT: 866-253-4090
  11. GA: 800-255-0135
  12. WV 800-982-8772
  13. AZ 800-842-4681
  14. KS 800-766-3777
  15. MD 800-201-7165
  16. Saipan: 866-339-9384
  17. Virgin Islands: 800-809-8477
- D. Ask the 911 dispatch operator if they know how to use the relay. If yes proceed to item "E".
  1. Relay Explanation  
The person you are calling through relay will be typing their conversation and the Operator will read it to you.
- E. Ask the 911 dispatch operator for their name or operator number. Record this information on the Operator's Emergency Call Slip.

Complete the Supervisor Emergency Call Slip in the Emergency Dispatch Numbers folder.

Through its outreach programs and outreach materials, Maryland Relay educates relay users about how to use 911 services. As a part of this information, Maryland Relay encourages relay users to call 911 direct and to contact their local emergency service personnel using a TTY to ensure that the 911 center will process a TTY call correctly if there ever were an actual emergency.

In addition, Maryland Relay gives presentations to 911 centers routinely as part of its outreach program. Maryland Relay provides training and other assistance to emergency dispatchers to ensure TTY calls or relay calls are handled correctly.

*(5) STS called numbers. Relay providers must offer STS users the option to maintain at the relay center a list of names and telephone numbers which the STS user calls. When the STS user requests one of these names, the CA must repeat the name and state the telephone number to the STS user. This information must be transferred to any new STS provider.*

## **Speech to Speech**

STS service allows individuals with a speech disability to use his/her own voice or a speech synthesizer when using the relay. STS users are able to communicate with any and all relay users including but not limited to VCO, HCO, TTY, 2LVCO, other STS users or standard phone users. Specially trained Operators process Speech to Speech calls. STS is also available in Spanish.

Maryland Relay's provision of Speech to Speech meets all FCC requirements for Speech to Speech call processing.

STS Operators are permitted to facilitate a call for a user with a speech disability if the user does not oppose the intervention as required by the FCC.

Maryland Relay provides STS users the same profile and all of the features contained within that profile which are currently available to other relay users. Maryland Relay has a feature, which allows all relay users, including STS users, to maintain a list of names and telephone numbers. A relay user simply gives the name of the person to call to the Operator, the Operator repeats the name and state the number of the person to call. The Speed Dial feature is of great benefit to STS users.

Maryland Relay complies with the 15-minute requirement prior to changing STS Operators. A Supervisor must approve and facilitate a STS Operator change. Maryland Relay exceeds the FCC standard for substitution of STS Operators.

If a change in STS Operator is necessary, another Operator will replace the Operator relaying the call at the same workstation so that the relay user's call is not interrupted except to identify the new Operator to both parties. The

replacement STS Operator will announce, “This is Operator# \_\_\_\_continuing your call.” A supervisor monitors the change and must approve the change based on the caller’s request or emergency circumstances.

All STS Operators have the authority, at the request of the STS user, to retain information beyond the duration of a call in order to facilitate the completion of consecutive calls. This information is retained only for the duration of the inbound call. STS Operators retain any important information given by the STS user which might be difficult for the STS relay user to repeat (i.e. credit card numbers, telephone numbers, account numbers, etc.) for use in a subsequent outbound call. Maryland Relay places a great emphasis on maintaining the confidentiality of relay users. As a result, all information is destroyed immediately upon termination of the inbound call. The above meets all FCC requirements for Speech to Speech call processing.